

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION

In re Janet L. Harris  
Vincent E. Harris

Case No. 17-35621-KRH  
Chapter 13

Debtors

Address: 1304 Poco Dr. Richmond, VA 23235

SSN: xxx-xx- 9499 and 3082

**NOTICE OF OBJECTION TO PROOF OF CLAIM**

COMES NOW, Vincent E. Harris and Janet L. Harris, ("Debtors"), by counsel has filed an objection to your claim in this bankruptcy case.

**Your claim may be reduced, modified, or eliminated. You should read these papers carefully and discuss them with your attorney if you have one.**

If you do not want the court to eliminate or change your claim, then on or before <30 days from today>, you or your attorney must: (THIRTY days from the filing of the Objection).

File with the court, a written response to the objection, explaining your position at: the address of the bankruptcy clerk's office pursuant to FRBP 3007, within 30 days of the filing of this Objection at below address.

Clerk of Court  
United States Bankruptcy Court  
701 E. Broad Street, Room 4000  
Richmond, VA 23219

**You must also mail a copy to:**

Joseph S. Massie, III, Esquire  
115 N.1st Street- Suite 100  
Richmond, VA 23219

If you or your attorney do not take these steps, the court may decide that you do not oppose the objection to your claim.

Massie Law Firm, PC  
Joseph Massie, III, Esquire (Bar No. 35472)  
115 N. 1<sup>st</sup> Street, Suite 100  
Richmond, VA 23219  
(804) 644-4878 (T)  
(804) 644-4874 (F)  
[jmassie@massielawfirm.com](mailto:jmassie@massielawfirm.com)

In re Janet L. Harris  
Vincent E. Harris

Debtor(s)

Case No. 17-35621-KRH  
Chapter 13

November 2, 2021

**RESPECTFULLY SUBMITTED**

Vincent E. Harris  
Janet L. Harris

/s/: Joseph S. Massie, III  
Joseph S. Massie, III, Esquire  
115 N.1st Street- Suite 100  
Richmond, VA 23219  
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**CERTIFICATE OF SERVICE**

I hereby certify that on May 27, 2021, by first class mail an exact copy of the foregoing Objection to Proof of Claim to Toyota Motor Credit Corporation c/o: Beckett and Lee, LLP, PO Box 3001 Malvern, PA 19355-0701 as well as all Creditors listed below and all necessary Parties.

**American Express Trs  
Po Box 297871  
Fort Lauderdale, FL 33329**

**Amex  
Correspondence  
Po Box 981540  
El Paso, TX 79998**

**Barclays Bank Delaware  
100 S West St  
Wilmington, DE 19801**

**Cap1/dbarn  
Capital One Retail Srvs/Attn: Bankruptcy  
Po Box 30258  
Salt Lake City, UT 84130**

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**Capital One**  
**Attn: Bankruptcy**  
**Po Box 30253**  
**Salt Lake City, UT 84130**

**Capital One**  
**Attn: General Correspondence/Bankruptcy**  
**Po Box 30285**  
**Salt Lake City, UT 84130**

**Cash Net USA**  
**P.O .Box 643990**  
**Cincinnati, OH 45264**

**Chase Card**  
**Attn: Correspondence Dept**  
**Po Box 15298**  
**Wilmington, DE 19850**

**Citibank / Sears**  
**Citicorp Credit Services/Attn: Centraliz**  
**Po Box 790040**  
**Saint Louis, MO 63179**

**Citibank/The Home Depot**  
**Citicorp Cr Srvs/Centralized Bankruptcy**  
**Po Box 790040**  
**St Louis, MO 63129**

**Conrad Accept**  
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**Escondido, CA 92025**

**Dell Financial Services**  
**Attn: Bankruptcy**  
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**Po Box 3025**  
**New Albany, OH 43054**

**Henrico Doctor's Hospital**  
**P.O. Box 13620**  
**Richmond, VA 23225**

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**Midland Funding**  
**Attn: Bankruptcy**  
**Po Box 939069**  
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**Ocwen Loan Servicing, Llc**  
**Attn: Research/Bankruptcy**  
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**West Palm Bch, FL 33409**

**Office of US Trustee**  
**701 E. Broad Street**  
**Suite 4300**  
**Richmond, VA 23219**

**Old Point National Ban**  
**1 W Mellen St**  
**Hampton, VA 23663**  
**Suzanne E. Wade**

**7202 Glen Forest Dr, Ste 202**  
**Richmond, VA 23226**  
**Pg. 2 of 3**

**Synchrony Bank**  
**Attn: Bankruptcy**  
**Po Box 965060**  
**Orlando, FL 32896**

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**Synchrony Bank/Sams Club**  
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**Toyota Motor credit Corp**  
**Po Box 8026**  
**Cedar Rapids, IA 52408**

**Tricom Management**  
**4025 E La Palma Avenue # 1 101**  
**Anaheim, CA 92807**

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**6277 Sea Harbor Dr**  
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**:**

**Case No. 17-35621-KRH**  
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**OBJECTION TO PROOF OF CLAIM**

**COMES NOW**, Vincent E. Harris and Janet L. Harris, (“Debtors”), by counsel,  
and pursuant to 11 U.S.C. Rule 3007, Objection to Claim(s), Debtor’s object to claim number  
4 by Toyota Motor Credit Corporation.

1. Debtors filed for protection under Chapter 13 of U.S.C. Bankruptcy Code  
November 10, 2017.
2. On December 14, 2017, Toyota Motor Credit Corporation , filed  
claim number 4.
3. On February 14, 2019, Toyota Motor Credit Corporation amended the  
claim to \$13,078.72, thirteen thousand and seventy-eight dollars and seventy-  
two cents.
4. Debtors object to claim number 4, as they believe that Toyota Motor Credit  
Corporation failed to sell the vehicle in a commercially reasonable manner, and  
As a result, failed to recover a reasonable sum and minimize damages.  
Toyota has a statutory duty to mitigate their damages with a  
“commercially reasonable sale” pursuant to VA Code 8.9A-610(b). The failure  
to comply with 8.9A-610 results in entitlement to damages under  
8.9A-625 and 8.9A-626, amounting to the entire finance charge plus 10% of  
the principal and credit for the proper amount of credit, amounting to 5638.86  
for the finance charge and 4008.49 for the 10% of the amount financed, reducing

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the balance by 9647.35 plus the amount of credit had the collateral been sold properly, reducing the amount from 13,078.72 to 3431.37 plus credit for proper sale in the approximate amount of \$4,000, resulting in a credit balance, not a debt, in the amount of just under \$600.00.

5. The Debtors are requesting that claim number 4 be reduced to \$0.00, zero dollars and zero cents.

WHEREFORE, Debtors request that the Court sustain the objection.

November 2, 2021

RESPECTFULLY SUBMITTED

Vincent E. Harris  
Janet L. Harris

By: /s/ Joseph S. Massie, III  
Joseph S. Massie, III, Esquire  
115 N. 1st Street- Ste 100  
Richmond, Virginia 23219-2125  
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By: /s/: Joseph Massie, III

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***Debtor***

Vincent E. Harris

Janet L. Harris

1304 Polo Drive

Richmond, Virginia 23235

Toyota Motor Credit Corporation  
c/o: Beckett & Lee Law Firm, LLP  
PO Box 3001  
Malvern, PA 19355-0701

***Trustee***

Suzanne Wade

PO Box 1780

Richmond, VA 23230

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If you do not want the court to eliminate or change your claim, then on or before 30 days from today, you or your attorney must:.

File with the court, a written response to the objection, explaining your position at: the address of the bankruptcy clerk's office pursuant to FRBP 3007, within 30 days of the filing of this Objection at below address.

Clerk of Court United States Bankruptcy Court 701 E. Broad Street, Room 4000 Richmond, VA 23219	<b><u>You must also mail a copy to:</u></b>  Joseph S. Massie, III, Esquire 115 N.1st Street- Suite 100 Richmond, VA 23219
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I hereby certify that on , November 2, 2021, by first class mail an exact copy of the foregoing Objection to Proof of Claim to

**Toyota Motor Credit Corporation  
c/o: Beckett and Lee, LLP,  
PO Box 3001  
Malvern, PA 19355-0701**

**Toyota Motor Credit Corporation  
r/a CT Corporation System  
4701 Cox Rd., Suite 285  
Glen Allen, VA 23060**

**Vincent and Janet Harris  
1304 Poco Dr.  
Richmond, VA 23235**

**Suzanne Wade, Chapter 13 Trustee  
7202 Glen Forest Dr, Ste 202  
Richmond, VA 23226**

**as well as all Creditors listed below and all necessary Parties.**

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Saint Louis, MO 63179**

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**Dell Financial Services  
Attn: Bankruptcy  
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**Wyndham Vacation Ownership  
6277 Sea Harbor Dr  
Orlando, FL 3282**

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1. Debtors filed for protection under Chapter 13 of U.S.C. Bankruptcy Code  
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to comply with 8.9A-610 results in entitlement to damages under 8.9A-625 and 8.9A-626, amounting to the entire finance charge plus 10% of the principal and credit for the proper amount of credit, amounting to 5638.86 for the finance charge and 4008.49 for the 10% of the amount financed, reducing the balance by 9647.35 plus the amount of credit had the collateral been sold properly, reducing the amount from 13,078.72 to 3431.37 plus credit for proper sale in the approximate amount of \$4,000, resulting in a credit balance, not a debt, in the amount of just under \$600.00.

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***Trustee***

Suzanne Wade

PO Box 1780

Richmond, VA 23230

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